

EXHIBIT C

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE: TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

)
) **Civil Action No. 03 MDL 1570 (GBD) (FM)**
)
)

This document relates to: All actions

**DEFENDANTS THE MUSLIM WORLD LEAGUE AND INTERNATIONAL
ISLAMIC RELIEF ORGANIZATION'S SUPPLEMENTAL
INTERROGATORIES MADE PURSUANT TO THE COURT'S
NOVEMBER 3, 2015 ORDER (DOCKET NO. 3104)**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure and the Court's November 3, 2015 Order (Docket No. 3104), The Muslim World League ("MWL") and International Islamic Relief Organization ("IIRO") hereby serves its supplemental set of Interrogatories to Plaintiffs, which shall respond in writing within thirty (30) days after service.

DEFINITIONS

1. Local Rule 26.3 of the Local Rules of this Court applies to these Interrogatories including definitions and constructions.
2. "Plaintiffs," "You," and "Your" mean the Plaintiffs in any of the cases comprising the 9/11 Litigation, Case No. 03 MDL 1570, and their counsel, and, where applicable, Plaintiffs' officers, directors, employees, partners, corporate parent, subsidiaries or affiliates.
3. "Person," as provided by Local Rule 26.3, means any natural person, or any legal entity, including without limitation any business or governmental entity or association.
4. "Document" and "Documents" mean "documents or electronically stored information" as that term is used in Rule 34(a)(1)(A) of the Federal Rules of Civil Procedure. If a Document has been prepared in several copies, or if additional copies have been made, and the

copies are not identical (whether different from the original because of notes made on such copies or otherwise), each non-identical copy is a separate Document.

5. “Documents In Question” refer to the following documents produced by the *Burnett* Plaintiffs in this litigation: Documents Bates numbered BUR-PEC-086106, BUR-PEC-086107, BUR-PEC-086108, BUR-PEC-086109, BUR-PEC-086110, BUR-PEC-086111, BUR-PEC-086112, BUR-PEC-086113, BUR-PEC-086114, BUR-PEC-086115, and BUR-PEC-086116.

6. “Identify,” as provided by Local Rule 26.3, means as applied to a person to give, to the extent known, the person’s full name, present or last known address, and when referring to a natural person, additionally, the present or last known place of employment.

7. “Identify,” as provided by Local Rule 26.3, means as applied to a document, means to give, to the extent known: (i) the type of document; (ii) general subject matter; (iii) date of the document; and (iv) author(s), addressee(s), and recipient(s).

INSTRUCTIONS

1. You are required, in responding to these Interrogatories, to obtain and furnish all information available to you that is in your possession, custody or control, or in the possession, custody or control of any of your representatives, officers, directors, employees, agents, servants or attorneys.

2. Each Interrogatory that seeks information relating in any way to communications to, from, or within parties is hereby designated to mean, and should be construed to include, all communications to, from, and/or by and between representatives, officers, directors, employees, agents, servants and/or anyone acting on behalf of those parties.

3. If you decline to answer any Interrogatory or any portion of any Interrogatory due to a claim of any attorney/client, and/or other privilege, state fully the basis for the claim of

privilege, including, in accordance with (or as modified by) any agreement of the parties, the following:

- (a) the type of privilege asserted or reason why you contend it is confidential;
- (b) the factual basis for the claim of privilege and/or confidentiality;
- (c) the subject matter of the information or document withheld;
- (d) the date of the information or document withheld; and
- (e) the author and recipient of the information or document withheld.

4. These Interrogatories are deemed to be continuing. Should you obtain information or documents subsequent to your response(s) that would add to or otherwise change your response(s), including the documents produced to you, you are directed to produce such additional or different information or documents to the undersigned attorneys immediately upon your discovery or receipt of such information or documents.

INTERROGATORIES

Interrogatory No. 1

For the Documents In Question, Identify the following:

- (a) the name of the source from which You obtained each document;
- (b) the date on which You obtained each document from the source identified in response to (a) above;
- (c) the document format in which You received each document.

ANSWER:

Interrogatory No. 2

To the extent You refuse to identify any source from which You obtained the Documents in Question, as requested in Interrogatory No. 1:

- (a) describe with specificity the manner in which the source obtained each document;

- (b) Identify any individual who provided to the source any information relating to the Documents in Questions.

ANSWER:

Interrogatory No. 3

For the Documents in Question, describe with specificity the circumstances leading to Your receipt of each document.

ANSWER:

Interrogatory No. 4

For the Documents In Question, state the following for each document:

- (a) whether the source obtained the document containing an original signature or a photocopy of the document;
- (b) whether You have seen the document containing an original signature at any time;
- (c) whether You have knowledge whether the document containing an original signature exists and the basis for such knowledge;
- (d) whether You have knowledge of the whereabouts and/or the Person in possession of the document containing an original signature.

ANSWER:

Interrogatory No. 5

For the Documents In Question, state and describe with specificity:

- (a) the precise chain of custody, from the date of its alleged discovery until its receipt by You, to include the name and addresses of each document custodian, as well as the corresponding date, location, and circumstances of transfer;
- (b) whether any document custodian listed above in subpart (a) had at any point in time seen and/or maintained custody of any document with an original signature.

ANSWER:

Interrogatory No. 6

For the Documents In Question, state and describe with specificity:

- (a) whether any marking was added by You to any document before it was produced in this litigation;
- (b) whether any marking was added by the source of the document at any time;
- (c) if any marking was added by You or the source, describe with specificity: (i) the marking; (ii) the identity of the Person responsible for the marking; (iii) the date on which the marking was added to the document; and (iv) the meaning of the marking that was added and the purpose of such marking;
- (d) the Identity of the Person(s) responsible for any translation of the document that has been produced.

ANSWER:

Interrogatory No. 7

Identify the Bates Numbers of all documents produced in this litigation that were:

- (a) obtained from any of the same source(s), as provided in Your response to Interrogatory 1(a), from which You obtained the Documents in Question;
- (b) obtained from any of the document custodians, as provided in Your response to Interrogatory 5(a), from which You obtained the Documents in Question.

ANSWER:

Interrogatory No. 8

Describe with specificity and detail any investigation performed by You concerning the source, authenticity and/or genuineness of the Documents in Question both prior to, as well as after the documents were produced in this litigation.

ANSWER:

Interrogatory No. 9

State whether You are aware of other instances where the authenticity of any documents obtained from any of the source(s), as provided in Your response to Interrogatory 1(a), or document custodians, as provided in Your response to Interrogatory 5(a), has ever been

challenged and, if yes, describe with specificity Your understanding of the circumstances leading to that challenge and the resolution, if any, of that challenge.

ANSWER:

Interrogatory No. 10

Identify any Person with knowledge of or information concerning the authenticity of the Documents In Question.

ANSWER:

Interrogatory No. 11

Identify each Person who supplied any information used to respond to these Interrogatories, and state the facts, knowledge, or information concerning which each Person is aware.

ANSWER:


Interrogatory No. 12

Identify each document, fact(s) and/or other data that You believe evidences, supports, substantiate or otherwise concerns the information provided by You in response to these Interrogatories.

ANSWER:

Dated: November 18, 2015

Respectfully Submitted,


Aisha E. Bembry
Lewis Baach pllc
1899 Pennsylvania, N.W., Suite 600
Washington, D.C. 20006
Tel: (202) 659-7872
Fax: (202) 466-5738
aisha.bembry@lewisbaach.com

*Counsel for Defendants The Muslim World
League and International Islamic Relief
Organization*

CERTIFICATE OF SERVICE

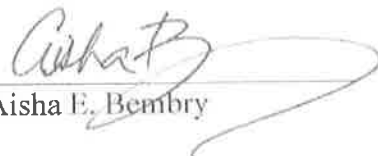
I, hereby certify that on the 18th day of November 2015, I caused a copy of Defendants The Muslim World League and International Islamic Relief Organization's Supplemental Interrogatories Made Pursuant to the Court's November 3, 2015 Order (Docket no. 3104) to be served by electronic mail and Federal Express upon Plaintiffs' Executive Committee:

Robert Haefe
MOTLEY RICE LLC
28 Bridgeside Boulevard
P.O. Box 1792
Mount Pleasant, SC 29465
rhaefe@motleyrice.com
For the *Burnett* Plaintiffs and the Plaintiffs' Executive Committees

Jerry S. Goldman
ANDERSON KILL
1251 Avenue of the Americas
New York, NY 10020
jgoldman@andersonkill.com
For the *O'Neill* Plaintiffs and Plaintiffs Executive Committees

Sean Carter
Scott Tarbutton
COZEN O'CONNOR
1650 Market Street
Philadelphia, PA 19103
SCarter1@cozen.com
STarbutton@cozen.com
For the *Federal Insurance* Plaintiffs and Plaintiffs Executive Committees

James Kreindler
Andrew J. Maloney
KREINDLER & KREINDLER LLP
jkreindler@kreindler.com
amaloney@kreindler.com
750 Third Avenue
New York, NY 10017
For the *Ashton* Plaintiffs and Plaintiffs Executive Committees


Aisha E. Bembry